

EXHIBIT G

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

THEODORE KOZIOL and LOIS KOZIOL, *
Plaintiffs, * CIVIL ACTION
vs. * NO. 00-1938 (GEB)
*
BOMBARDIER-ROTAX GmbH, *
MOTORENFABRIK; BOMBARDIER *
INC.; KODIAK RESEARCH LTD.; and *
ROTECH RESEARCH CANADA LTD *
a/k/a KODIAK RESEARCH CANADA, *
LTD. *
Defendants *

ORAL DEPOSITION

OF

PASCAL RONVEAUX

APRIL 30, 2002

1 ANSWERS AND DEPOSITION OF PASCAL RONVEAUX,
2 produced as a witness at the instance of the Defendant, and
3 duly sworn, was taken in the above-styled and numberd cause
4 on the 30th day of April, 2002, from 10:00 a.m. to 12:48
5 p.m., before Judith M. Clare, a Certified Shorthand Reporter
6 in and for the city of Nassau, Bahamas, by machine shorthand,
7 at the Sheraton British Colonial Hilton, located at
8 Bay Street, in the city of Nassau, New Providence,
9 Commonwealth of The Bahamas.

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By Telephone:

MS. CATHERINE B. SLAVIN, ESQ.

Wolk & Genter

1710-12 Locust Street

Philadelphia, PA 19103

MR. ROBERT M. GOODMAN, ESQ.

CARPENTER, BENNETT & MORRISSEY

Three Gateway Center

100 Mulberry Street

Newark, New Jersey 07102-4079

MR. ROBERT JACK KELLY, ESQ.

1 A. No. I can't find one.

2 Q. Were you ever covered on the Bombardier-Rotax's
3 policy in 1999?

4 A. I believe so, but I don't know if --

5 Q. When did you cease being named or having insurance
6 coverage under the Bombardier-Rotax's policy?

7 A. I believe January 2001.

8 Q. Very well. Now, sir, what is the business, if you
9 could in your own words, of Kodiak Research, Limited, Nassau,
10 Bahamas?

11 A. The distributor for Rotech's aircraft engine for
12 North and Central and South America.

13 Q. You don't distribute other Rotech's engines, just
14 aircraft engine?

15 A. Just ultra light engines, that's correct.

16 Q. Does Rotech make engines, aircraft engines other
17 than ultra light engines?

18 A. Do they make other engines?

19 Q. No. Do they make other aircraft engines other than
20 ultra light engines?

21 A. Not that I am aware of.

22 Q. So you are not aware that they make aircraft
23 engines that are -- whether Rotax makes engines that are
24 certified by the American Federal Aviation Administration?

25 A. Yes, I am aware but I meant light aircraft as

1 Q. Do you sell engine components or engines to
2 maintenance facilities?

3 A. No, we have service centers.

4 Q. So are you telling me that the only way to get a
5 replacement part is through a service center?

6 A. Yes.

7 Q. Okay. Why don't we do this. What are the service
8 centers in the United States?

9 A. Where are they located?

10 Q. Yes, or who are they?

11 A. They are independent service centers, companies
12 that are buying parts and engines from us.

13 Q. Okay. Can you give me some names? Can you tell me
14 who your authorized service centers are?

15 A. Yes.

16 Q. Who are they?

17 A. Ultra Light SRL in Argentina, Ultra Motors in
18 Brazil, LAG Ultra Lights in Colombia.

19 Q. How about in the United States?

20 A. I am getting to it. I am trying to put them in
21 alphabetical order, that's all. California Power System
22 Inc., in California; South Mississippi's Ultra Light Inc., in
23 Mississippi; LEAF Inc., Leading Edge Areas Foil in which is
24 Wisconsin; and the last one is Lockwood, L-O-C-K-W-O-O-D,
25 Aviation Inc., in Sebring, Florida, I believe to the best of

1 A. To what extent?

2 Q. For the engines that you buy from Bombardier-Rotax
3 and sell in the United States?

4 A. Kodiak Research Ltd. Bombardier-Rotax pays the
5 warrantee.

6 Q. They pay the warrantee, but who administers the
7 warrantee claims?

8 A. The service center, and then they put a claim to us
9 which we claim to Bombardier-Rotax.

10 Q. So is it fair to say that you basically the
11 warrantee claims made by services?

12 A. Yes.

13 Q. How about product support for the engines?

14 A. Yes.

15 Q. Is Kodiak Research, Limited, Nassau, Bahamas
16 responsible for product support for the engine?

17 A. To the OEM and service center, yes.

18 Q. And how about accident investigation. Is that one
19 of your company's responsibilities?

20 A. Yes, at the request from NTSB or Bombardier-Rotax.

21 Q. How does is it work? Suppose there is an aircraft
22 accident in New Jersey?

23 A. It will be bad luck.

24 Q. Well, it would certainly be bad luck, but if there
25 was an aircraft engine, would you be asked by Rotech to send

1 Q. Are you talking about on computer?

2 A. Right.

3 Q. Okay. Is one of your company's responsibilities
4 circulating technical directives and bulletins to owners of
5 Rotax engines?

6 A. No, we supply them to the service center in the
7 OAMs.

8 Q. You supply that information to the centers in the
9 OEM?

10 A. Yes.

11 Q. Which they, in turn, supply back to the owners and
12 operators?

13 A. Right.

14 Q. Did you ask any of your service centers if they
15 have a list of customer/owners of Rotax engines in New
16 Jersey?

17 A. They are not my service centers. They are
18 independent service centers and I did not ask them.

19 Q. Why don't we go to your reply certification, sir,
20 that's marked as Ronveaux-3. Do you have that document?

21 A. We are looking for it.

22 MR. GOODMAN: We have it.

23 Q. Could you take a look at it, sir?

24 A. Yes.

25 Q. It's a two page document entitled, "Reply

1 A. Yes.

2 Q. Below that, paragraph 3, "A list of the customers
3 of Kodiak Research, Limited located in New Jersey"?

4 A. Yes.

5 Q. "Kodiak states that it presently has no customers
6 in New Jersey." What do you mean by "customers"?

7 A. No OEM service centers.

8 Q. Do you not consider an owner or operator who makes
9 a claim to be a customer?

10 A. No.

11 Q. So, that response is only relating to original
12 equipment manufacturers or service centers; is that correct?
13 You do not consider persons who own ROTAX engines to be your
14 customers?

15 A. No. They deal through the service centers in OEM
16 which are my customers, and in turn --

17 Q. So, even though you process the warrantee claims,
18 they are not customers?

19 A. I process the warrantee claims for the service
20 centers and the OEM.

21 Can we take a break for five minutes.

22 (Five-minute break taken)

23 BY MS. SLAVIN:

24 Q. Are any of the computer records, Mr. Ronveaux, with
25 respect to any warrantee claim processing that your company

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7 I, _____, have read the foregoing
8 deposition and hereby affix my signature that same is true
9 and correct, except as noted above.

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Signature of Witness

IN THE COMMONWEALTH OF THE BAHAMAS

SUBSCRIBED AND SWORN TO by the said witness _____
on this the _____ day of _____, 2002.

Notary Public in and for
The Commonwealth of The Bahamas

1 COMMONWEALTH OF THE BAHAMAS X
2 ON THE ISLAND OF NEW PROVIDENCE X

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4
5 I, Judith M. Clare, a Certified Shorthand Reporter
6 duly gazetted and qualified in Nassau, The Bahamas, do hereby
7 certify that there came before me on the 30th of April, 2002,
8 at the Sheraton Colonial Hilton, Bay Street, Nassau, Bahamas,
9 the following named person, to wit; PASCAL RONVEAUX, who was
10 duly sworn to testify the truth, the whole truth and nothing
11 but the truth of his knowledge touching and concerning the
12 matters in controversy in this cause; and that he was
13 thereupon examined upon his oath and his examination reduced
14 to typewriting under my supervision; that the deposition is a
15 true record of the testimony given by the witness, and
16 signature of witness is to be before any notary public.

17 I further certify that I am neither attorney or
18 counsel for, not related to or employed by any of the parties
19 to the action in which this deposition is taken, and further
20 that I am not a relative or employee of any attorney or
21 counsel employed by the parties hereto, or employed by any of
22 the parties to the action in which this deposition is taken,
23 and further that I am not a relative or employee of any
24 attorney or counsel employed by the parties hereto, or
25 financially interested in the action.

1 Certified by me on this the 1st day of September,
2 2002.

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JUDITH M. CLARE

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SUPREME COURT REPORTER

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JUDICIAL DEPARTMENT

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P. O. BOX N-4002

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NASSAU, BAHAMAS

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